Application No. 09/772,427
Supplemental Amendment dated September 8, 2003

<u>**Listing of Claims**</u>:

This listing of claims will replace all prior versions, and listings, of claims in the application:

1. (cancelled)

2. (previously cancelled)

3. (cancelled)

4. (cancelled)

5. (cancelled)

6. (previously cancelled)

7. (previously cancelled)

8. (cancelled)

9. (previously cancelled)

10. (cancelled)

11. (cancelled)

12. (cancelled)

2

NYB 1431447.2

Application No. 09/772,427
Supplemental Amendment dated September 8, 2003

13. (previously cancelled)

14. (cancelled)

15. (previously cancelled)

16. (cancelled)

17. (cancelled)

18. (cancelled)

19. (cancelled)

20. (cancelled)

21. (previously cancelled)

22. (previously cancelled)

23. (previously cancelled)

24. (currently amended) A computer-implemented method for facilitating the management of risk related to political exposure, the method comprising:

receiving digital data into a computer system storage relating details of a financial transaction wherein the data received comprises identification data for at least one transaction participant;

3

Application No. 09/772,427
Supplemental Amendment dated September 8, 2003

indicating in the computer system that one or more persons are politically identified persons based upon the one or more persons' status as at least one of: an elected official, a bureaucrat, a political appointee, a World Bank Official or a military personnel;

gathering digital data into the computer system storage generally related to one or more politically identified persons;

[structuring the gathered data generally related to one or more politically identified persons and the data relating details of the financial transaction according to one or more risk quotient criteria indicative of an amount of at least one of: regulatory risk, reputational risk, legal risk and risk associated with a cost to defend an adverse position and wherein the one or more risk quotient criteria comprise an indication of whether the at least one transaction participant comprises a politically identified person; and]

C1

structuring the digital data relating details the financial transaction comprising identification data for the at least one transaction participant and the digital data generally related to one or more politically identified persons according to risk quotient criteria indicative of an amount of regulatory risk, wherein the risk quotient criteria comprise an indication of whether the at least one transaction participant comprises a politically identified person; and

generating a report comprising an indication of whether the at least one transaction participant is a politically identified person and at least some of the structured data indicating whether the at least one transaction participant comprises a politically identified person.

25. (cancelled)

26. (cancelled).

4

Application No. 09/772,427
Supplemental Amendment dated September 8, 2003

27. (currently amended) The method of claim 24 additionally comprising the step of calculating a risk quotient comprising at least one of: a scaled numeric value and a scaled alphanumeric value and wherein the risk quotient is based upon the structured data and indicative of an amount of regulatory risk.

28. (cancelled).

29. (currently amended) The method of claim 24 additionally comprising the step of calculating a risk quotient comprising at least one of: a scaled numeric value and a scaled alphanumeric value and wherein the risk quotient is based upon the structured data and indicative of an amount of regulatory risk associated with monetary costs related to potential fines.

30. (original) The method of claim 24 wherein the gathered data comprises world events received via a news feed.

31. (original) The method of claim 24 wherein the gathered data comprises at least one government advisory.

32. (original) The method of claim 24 wherein calculating the risk quotient criteria comprises measuring account activity against the politically identified person's salary.

33. (original) The method of claim 24 additionally comprising the steps of presenting the report as evidence of due diligence to at least one of: a regulatory body, a shareholder and a news media.

34. (original) The method of claim 24 additionally comprising the steps of:
        identifying one or more secrecy jurisdictions; and

5

NYB 1431447.2

including in the report generated an indication that the politically identified person is associated with a secrecy jurisdiction.

35. (original) The method of claim 24 additionally comprising the step of generating a suggested action in real time based upon the risk quotient and at least some of the structured data.

36. (original) The method of claim 24 wherein the data related to one or more politically identified persons comprises data indicative of at least one of: fraud, money laundering, foreign corrupt practices, bribery, embargoes and sanctions.

37. (currently amended) A computer-implemented method for facilitating the quantification of risk due diligence related to political exposure, the method comprising:

receiving into a computer system digital data relating details of a financial transaction wherein the details of the transaction comprise identification data for at least one transaction participant;

[receiving]gathering digital data into the computer system generally related to one or more politically identified persons based upon the one or more persons status as at least one of: an elected official, a bureaucrat, a political appointee, a World Bank Official or a military personnel;

receiving into the computer system an indication of the source of the received data generally related to one or more politically identified persons;

indicating in the computer system that the transaction participant is a politically identified person according to the transaction participant's status as at least one of: an elected official, a bureaucrat, a political appointee, a World Bank Official or a military personnel;

structuring the gathered digital data generally related to one or more politically identified persons and the digital data relating details of the financial transaction

6

Application No. 09/772,427
Supplemental Amendment dated September 8, 2003

according to one or more risk quotient criteria indicative of an amount of regulatory risk, and wherein the risk quotient criteria comprise an indication of whether the at least one transaction participant comprises a politically identified person; and

generating a report comprising at least one of: an indication that the transaction participant is a politically identified person; an indication of one or more of: a position held by the transaction participant; a country in which the position is held; how long the position has been held; the veracity of previous dealings with persons from the country in which the position is held; the propensity of people in similar positions to execute unlawful transactions; and the propensity of people in similar positions to execute unethical transactions; and wherein the report additionally comprises a type of account involved in the transaction[;] and an indication of the source of the at least some of the structured data.

C4

38. (currently amended) The method of claim 37 wherein the [risk due diligence relates to a cost to defend an adverse position] gathered data comprises an indication of the source of funds comprising the financial transaction.

39. (currently amended) The method of claim 3[8]7 wherein the risk due diligence relates to reputational risk.

40. (currently amended) The method of claim 3[8]7wherein the risk due diligence relates to regulatory risk.

41. (currently amended) The method of claim 3[8]7wherein the risk due diligence relates to legal risk.

42. (currently amended) The method of claim 3[8]7wherein the step of indicating that the transaction participant is a politically identified person is based upon the data generally related to one or more politically identified persons.

7

Application No. 09/772,427
Supplemental Amendment dated September 8, 2003

43. (currently amended) The method of claim 24 wherein the risk criteria additionally comprises at least one of: a request to involve a financial institution that is not accustomed to foreign account activity; a request for an exception to the Bank Secrecy Act; routing through a secrecy jurisdiction; missing wire information; fund flow through multiple jurisdictions; fund flow through multiple financial institutions; use of a government owned bank; wiring an equivalent amount of money into and out of an account; and multiple instances of zeroing of an account balance.

44. (currently amended) A computerized system for facilitating risk associated with a financial transaction, the system comprising:

a computer server comprising a programmable processor and database system and accessible via a distributed network;

one or more network access devices for accessing the computer server via the distributed network, each network access device comprising a processor, memory and user input device;

an electronic data source for transmitting digital data to the computer server;

executable software, executable on demand by the computer server and operative with the programmable processor in the computer server to cause the computer server to:

receive digital data from the electronic data source, the digital data generally related to one or more politically identified persons based upon the one or more persons' status as at least one of: an elected official, a bureaucrat, a political appointee, a World Bank Official or a military personnel;

receive digital data indicative of the source of the digital data that is generally related to one or more politically identified persons;

receive digital data relating details of a financial transaction wherein the details of the transaction comprise identification data for at least one transaction participant;

8

Application No. 09/772,427
Supplemental Amendment dated September 8, 2003

indicate that the at least one transaction participant is a politically identified person according to the at least one transaction participant's status as at least one of: an elected official, a bureaucrat, a political appointee, a World Bank Official or a military personnel;

structuring the gathered data generally related to one or more politically identified persons and the data relating details of the financial transaction according to one or more risk quotient criteria indicative of an amount of [at least one of:]regulatory risk, [reputational risk and legal risk]and wherein the one or more risk quotient criteria comprise an indication of whether the at least one transaction participant comprises a politically identified person; and

transmit digital data to the network access device, the digital data comprising a report comprising: an indication of whether the at least one transaction participant is a politically identified person; at least some of the structured data related to the transaction participant; and an indication of the source of the structured data related to the transaction participant; and

executable software, executable on demand by the network access device and operative with the network access device to cause the network access device to:

transmit digital data to the computer server identifying a transaction participant ; and

receive digital data from the computer server comprising a report, the report comprising: an indication of whether the transaction participant is a politically identified person; data related to the transaction participant and indicative of an amount of regulatory risk; and an indication of the source of the data related to the transaction participant.

9

45. (new) The method of claim 24 wherein the details of the financial transaction comprises a source of funds involved in the financial transaction and the generated report additionally comprises an indication of the source of funds involved in the transaction.

46. (new) A computer-implemented method for facilitating the management of risk related to political exposure, the method comprising:

receiving digital data into a computer system storage relating details of a financial transaction wherein the digital data received comprises identification data for at least one transaction participant;

indicating in the computer system that a person is a politically identified person based upon the person's status as at least one of: an elected official, a bureaucrat, a political appointee, a World Bank Official or a military personnel;

gathering digital data into the computer system generally related to a politically identified person and source of wealth controlled by the politically identified person;

structuring the gathered digital data generally related to the politically identified person and the data relating details of the financial transaction according to one or more risk quotient criteria indicative of an amount of [at least one of:]regulatory risk, [reputational risk and legal risk]and wherein the one or more risk quotient criteria comprise an indication of whether the at least one transaction participant comprises the politically identified person;

receiving a request for one or more of: an indication that the at least one transaction participant is a politically identified person; and an indication of one or more of: a position held by the politically identified person; a country in which the position is held; how long the position has been held; the veracity of previous dealings with persons from the country in which the position is held; the propensity of people in similar positions to execute unlawful transactions; and the propensity of people in similar positions to execute unethical transactions; and

generating a report comprising an indication that the at least one transaction participant is a politically identified person; at least some of the structured data relating to

10

Application No. 09/772,427
Supplemental Amendment dated September 8, 2003

the at least one transaction participant; a source of wealth controlled by the at least one transaction participant identified as a politically identified person and an indication of one or more of: a position held by the politically identified person; a country in which the position is held; how long the position has been held; the veracity of previous dealings with persons from the country in which the position is held; the propensity of people in similar positions to execute unlawful transactions; and the propensity of people in similar positions to execute unethical transactions.

11